

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> Debtors. ¹	PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered)
In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO ELECTRIC POWER AUTHORITY, Debtor.	PROMESA Title III No. 17 BK 4780-LTS Re: Dkt. Nos. 881, 882 Motion Relates Only to PREPA and Shall be Filed in Both the Lead Case No. 17 BK-3283-LTS and in PREPA's Title III Case No. 17 BK 4780-LTS

**JOINT MOTION FOR AN EXTENSION OF TIME IN CONNECTION
WITH LORD ELECTRIC COMPANY OF PUERTO RICO, INC.'S
MOTION FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIMS**

The Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF"), on behalf of the Puerto Rico Electric Power Authority ("PREPA") pursuant to the authority granted to it under the *Enabling Act of the Fiscal Agency and Financial Advisory Authority*, Act 2-2017, and Lord Electric Company of Puerto Rico, Inc. ("Movant"), by and through their undersigned counsel,

¹ The Debtors in the jointly-administered Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

respectfully submit this joint motion for entry of an order, substantially in the form attached hereto as **Exhibit A**, extending the deadlines in connection with the *Motion for Allowance of Administrative Expense Claims* [Case No. 17-04780, Dkt. No. 881] (the “Motion for Administrative Expense Claims” or “Motion”) filed by Movant.² In support of this motion, the parties respectfully state as follows:

BACKGROUND

On June 22, 2018, the Movant filed the Motion for Administrative Expense Claims seeking the allowance of an alleged post-petition administrative expense claim in the amount of \$1,091,860.96. Pursuant to this Court’s order entered on June 22, 2018, any opposition to the Motion for Administrative Expense Claims must be filed by July 6, 2018, and any reply must be filed by July 13, 2018 [Case No. 17-04780, Dkt. No. 882].

Counsel for AAFAF and Movant have had two conferences to discuss a mutually agreeable resolution of the Motion. Counsel for AAFAF, however, requires additional time to obtain and review information pertinent to the Motion. As a result, AAFAF requested, and Movant agreed, to extend the date by which AAFAF’s response to the Motion is due. AAFAF submits that no party or creditor will be prejudiced by this extension.

RELIEF REQUESTED

In consideration of the foregoing, the parties have agreed to a seven (7) day extension of the applicable deadlines. The parties request entry of an order extending the deadlines as follows:

- Any opposition to the Motion for Administrative Expense Claims shall be filed by
July 13, 2018.

² The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”), 48 U.S.C. §§ 2101-2241, has authorized AAFAF to file this motion on behalf of PREPA.

- Any reply in support of the Motion shall be filed by **July 20, 2018**.

WHEREFORE, the parties request the Court to enter an order, substantially in the form attached hereto as **Exhibit A**, (a) granting the motion and (b) granting such other relief as is just and proper.

Dated: July 6, 2018
San Juan, Puerto Rico

Respectfully submitted,

THE PUERTO RICO FISCAL AGENCY
AND FINANCIAL ADVISORY
AUTHORITY, as Fiscal Agent for PREPA

LORD ELECTRIC COMPANY
OF PUERTO RICO, INC.

By its attorneys,

By its attorneys,

/s/ Kevin D. Finger

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THE PUERTO RICO ELECTRIC
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Exhibit A
Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> Debtors. ¹	PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered)
In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO ELECTRIC POWER AUTHORITY, Debtor.	PROMESA Title III No. 17 BK 4780-LTS Re: Dkt. Nos. 881, 882 This Order Relates Only to PREPA and Shall be Filed in Both the Lead Case No. 17 BK-3283-LTS and in PREPA's Title III Case No. 17 BK 4780-LTS

**ORDER GRANTING JOINT MOTION FOR AN EXTENSION
OF TIME IN CONNECTION WITH LORD ELECTRIC
COMPANY OF PUERTO RICO, INC.'S MOTION
FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIMS**

Upon the Joint Motion for an Extension of Time in Connection with Lord Electric Company of Puerto Rico, Inc.'s Motion for Allowance of Administrative Expense Claims (the "Motion")²

¹ The Debtors in the jointly-administered Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion.

and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306(a); and it appearing that venue is proper pursuant to PROMESA section 307(a); and the Court having found that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest, it is **HEREBY ORDERED THAT:**

1. The Motion is granted.
2. Any opposition to the Motion for Administrative Expense Claims shall be due on **July 13, 2018.**
3. Any reply shall be due on **July 20, 2018.**
4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.
5. This Order resolves docket entry no._____.

SO ORDERED.

Dated: _____, 2018
San Juan, Puerto Rico

LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE